

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

MARA FLAMM,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
SARNER & ASSOCIATES, P.C. and	:	
JOSHUA SARNER, ESQ. and	:	
LEONARD SARNER, ESQ. and	:	
JODI H. BROWN, M.D. and	:	
JOHN MATUSAVAGE,	:	
	:	
Defendants	:	NO. 02-4302

ORDER

AND, NOW, this _____ day of _____, 2003, upon consideration of Plaintiff's Motion to Amend her Complaint and the Response of Defendant, Jodi H. Brown, M.D., it is hereby **ORDERED** that said Motion is **DENIED**.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

MARA FLAMM,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
SARNER & ASSOCIATES, P.C. and	:	
JOSHUA SARNER, ESQ. and	:	
LEONARD SARNER, ESQ. and	:	
JODI H. BROWN, M.D. and	:	
JOHN MATUSAVAGE,	:	
	:	
Defendants	:	NO. 02-4302

ORDER

AND, NOW, this _____ day of _____, 2003, upon consideration of the Motion to Dismiss Count III of Plaintiff's Amended Complaint of Defendant, Jodi H. Brown, M.D. and any response thereto, it is hereby **ORDERED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Count III of Plaintiff's Amended Complaint is hereby **DISMISSED WITH PREJUDICE** as to Defendant, Jodi H. Brown, M.D.

BY THE COURT:

J.

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

MARA FLAMM,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
SARNER & ASSOCIATES, P.C. and	:	
JOSHUA SARNER, ESQ. and	:	
LEONARD SARNER, ESQ. and	:	
JODI H. BROWN, M.D. and	:	
JOHN MATUSAVAGE,	:	
	:	
Defendants	:	NO. 02-4302

**DEFENDANT, JODI H. BROWN, M.D.’S OPPOSITION
TO PLAINTIFF’S MOTION FOR LEAVE TO FILE AN
AMENDED COMPLAINT OR, IN THE ALTERNATIVE,
DEFENDANT, JODI H. BROWN, M.D.’S MOTION TO DISMISS
COUNT III OF PLAINTIFF’S PROPOSED AMENDED COMPLAINT**

Defendant, Jodi H. Brown, M.D. (“**Defendant Brown**”) respectfully moves this Honorable Court to deny Plaintiff’s Motion for Leave to File an Amended Complaint for those reasons set forth in the Memorandum of Law in Opposition to Plaintiff’s Motion for Leave to File an Amended Complaint filed by Defendants, Sarner & Associates, P.C., Joshua Sarner, Esq. and Leonard Sarner, Esq. (collectively “**Attorney Defendants**”) incorporated herein by reference. The Opposition to the Plaintiff’s Proposed Amendment of Attorney Defendants is attached hereto as **Exhibit “A”**.

A proposed form of Order is attached hereto.

BARATTA & RUSSELL, P.C.

Date: _____

By: _____
ANTHONY J. BARATTA
Attorney for Defendant, Jodi H. Brown, M.D.

VERIFICATION

ANTHONY J. BARATTA, ESQ., hereby states that he is counsel for Plaintiff in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

ANTHONY J. BARATTA. ESQUIRE

CERTIFICATE OF SERVICE

I, Anthony J. Baratta, Esq, attorney for Defendant, Jodi H. Brown, M.D. do hereby certify that I caused the foregoing pleading to be served this day by United States first class mail, postage prepaid to the following parties:

Robert P. Brand, Esquire
Fifth Floor
1200 Walnut Street
Philadelphia, PA 19107

James W. Christie, Esquire
William F. McDevitt, Esquire
Christie, Pabarue, Mortensen and Young, P.C.
1880 J.F.K. Boulevard
Philadelphia, PA 19103

ANTHONY J. BARATTA, ESQUIRE

Date: _____